

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

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JASON WILLIAMS,	:	
	:	
Plaintiff,	:	
	:	Case No.: 5:19-cv-00475-BO
vs.	:	
	:	
AT&T MOBILITY, LLC,	:	
	:	
Defendant.	:	
-----	X	

**DECLARATION OF CHRISTOPHER N. LAVIGNE
IN SUPPORT OF PLAINTIFF JASON WILLIAMS' OPPOSITION TO
DEFENDANT AT&T MOBILITY LLC'S MOTION TO COMPEL
TO PRODUCE DOCUMENTS AND RESPOND TO INTERROGATORIES**

I, Christopher N. LaVigne, hereby declare under penalty of perjury that the following is true and correct and state as follows:

1. I am an attorney admitted to practice law in the State of New York. I am a partner at the law firm of Withers Bergman LLP, counsel for Plaintiff Jason Williams in the above-entitled action. I was admitted via *Notice of Special Appearance* in this matter on November 8, 2019 (Doc. No. 11).

2. Attached hereto as Exhibit A is a copy of a series of meet and confer email communications between the parties' counsel, for the period October 29, 2020 thru December 22, 2020.

3. Attached hereto as Exhibit B is a copy of a series of meet and confer email communications between the parties' counsel, for the period October 29, 2020 thru January 28, 2021.

4. Attached hereto as Exhibit C is a copy of a series of email communications among the parties' counsel and representatives of Slush Pool, for the period February 23, 2021 thru March 2, 2021.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 29, 2021
New York, New York

By: 

Christopher N. LaVigne